

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORY OF
ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-T10-11)

The United States Postal Service hereby provides the revised response of witness Kingsley to the following interrogatory of Association for Postal Commerce: POSTCOM/USPS-T10-11, filed on March 27, 2000. The original answer was filed on April 10, 2000 and is contained at Tr. 5/1941-42.

The only change is to the response to subpart (b) of the interrogatory. The original response contained a figure of 14,500,267 for FY 99 clerk casual hours. The revised response contain the correct figure of 35,878,040 for FY 99 clerk casual hours.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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May 5, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF ASSOCIATION FOR POSTAL COMMERCE**

POSTCOM/USPS-T10-11 . Please refer to your response to TW/USPS-T10-1(a) where you provide FY 99 labor rates individually for Casual, PS-04, PS-05, and PS-06 clerks.

(a) Please provide average Test Year fully-loaded labor rates individually for Casual, PS-04, PS-05, and PS-06 clerks.

(b) Please provide FY 1999 work hours individually for Casual, PS-04, PS-05, and PS-06 clerks.

(c) Please provide projected Test Year work hours individually for Casual, PS-04, PS-05, and PS-06 clerks.

(d) Are Casual clerks qualified to do all work that PS-04 clerks are qualified to do? If not, please describe all work that PS-04 clerks are qualified to do, but Casuals are not qualified to do.

RESPONSE:

a. I am told that the FY 2001 projected national average labor rates for clerks, fully loaded with service wide costs are:

Casual - \$11.49

PS-04 - \$27.41

PS-05 - \$31.41

PS-06 - \$32.93

b. I am told that FY 99 clerk casual hours were 35,878,040 and clerk hours were 538,170,739, but a breakout of clerk hours by level is not available.

c. I am told that FY 2001 projected clerk-casual and clerk hours may be found in LR-I-127, Chapter 10, but a breakout of projected clerk hours by level is not available.

d. Not necessarily. Although a clerk-casual can theoretically be assigned to any job that that a PS-04 clerk can do, the tenure limitations on a casual may make it uneconomical to give a casual the training a clerk might receive. For example, it

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would be unusual to see a casual keying mail in a CFS unit or for the new AFSM-
100.

DECLARATION

I, Linda Kingsley, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Linda A. Kingsley

Date: 5-4-2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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